

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a  
BRAZOS LICENSING AND  
DEVELOPMENT,

Plaintiff,

V.

Huawei Investment & Holding Co., Ltd.,  
Huawei Technologies Co., Ltd.,  
Huawei Technologies USA Inc.,  
Huawei Device Co. Ltd. (f/k/a Huawei  
Device (Dongguan) Co.),  
Huawei Device (Shenzhen) Co., Ltd.  
(f/k/a Huawei Device Co., Ltd.),  
Huawei Device USA, Inc.

Defendants.

[illegible]

CIVIL ACTION NO. 6:20-cv-543  
CIVIL ACTION NO. 6:20-cv-544

## JURY TRIAL DEMANDED

## STIPULATION OF DISMISSAL

Plaintiff, WSOU Investments, LLC d/b/a Brazos Licensing and Development, and Defendants Huawei Investment & Holding Co., Ltd., Huawei Technologies Co., Ltd., Huawei Technologies USA Inc., Huawei Device Co. Ltd. (f/k/a Huawei Device (Dongguan) Co.), Huawei Device (Shenzhen) Co., Ltd. (f/k/a Huawei Device Co., Ltd.), Huawei Device USA, Inc., stipulate:

1. Under Fed. R. Civ. P. 41(a)(1)(A), Plaintiff voluntarily dismisses the following Defendants (the “Dismissed Defendants”) without prejudice and with no award of fees or costs to any party:

- a. Huawei Investment & Holding Co., Ltd.,
- b. Huawei Device Co. Ltd. (f/k/a Huawei Device (Dongguan) Co.),
- c. Huawei Device (Shenzhen) Co., Ltd. (f/k/a Huawei Device Co., Ltd.),
- d. Huawei Device USA, Inc.

2. The remaining Defendants, Huawei Technologies, Co., Ltd. and Huawei Technologies USA Inc. (“Remaining Defendants”) warrant that the Dismissed Defendants do not

manufacture, use, sell, offer for sale, or import any of the Accused Infringing Products into the United States.

3. The Remaining Defendants represent that the Dismissed Defendants do not possess discoverable information relevant to this lawsuit. For purposes of discovery in this case only, documents and information in the possession, custody, or control of the Dismissed Defendants are deemed also to be in the possession, custody, and control of the Remaining Defendants but only to the extent they may be relevant to this litigation, and they are not otherwise available from Remaining Defendants. The Remaining Defendants will not object to a request for deposition, documents, or any other information on the grounds that such is in the employ or possession of the Dismissed Defendants. Plaintiff and Remaining Defendants agree to meet and confer in good faith to resolve any objections consistent with the above agreement, including without limitation objections to the nature or scope of any requests for documents, information, testimony, or any other discoverable matter.

4. If later information or discovery reveals that the Dismissed Defendants should be parties to this lawsuit, Plaintiff reserves the right to seek joinder of the Dismissed Defendants to this lawsuit, and both the Dismissed Defendants and the Remaining Defendants agree that they will not oppose to such a joinder.

Dated: August 13, 2020

Respectfully submitted,

/s/ James L. Etheridge

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***Counsel for Huawei Technologies, Co., Ltd. and  
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